

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GLOBAL ENERGY AND MANAGEMENT, :  
LLC, a limited liability com- :  
pany of Connecticut, :

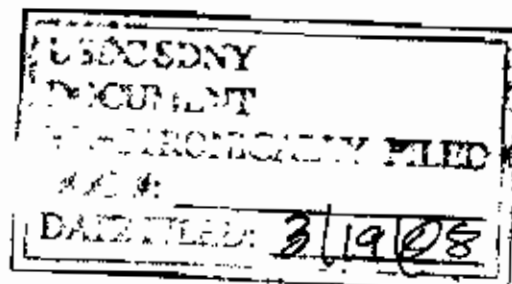
Plaintiff, :

07 Civ. 11049 NRB

-vs- :

KETHANOL CORPORATION, CHRISTO- :  
PHER D'ARNAUD-TAYLOR, JEFFERY :  
LANGBERG, LAWRENCE S. BELLONE, :  
LOUIS B. BERNSTEIN, DAVID AMES, :  
THOMAS J. ENDRES, ROBIN EUL- :  
LER, DAVID KREITZER and JOHN :  
MURPHY, :

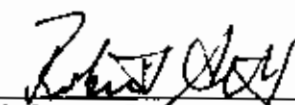
Defendants. :  
x



PLAINTIFF'S MOTION FOR LEAVE TO  
FILE SECOND AMENDED COMPLAINT

Global Energy and Management, LLC, a limited liability company of Connecticut, hereby moves for leave to file a second amended complaint. This application is based on the affidavit of Robert A. Vort. Notice has not been given to defendants because none of them has been served with a summons or either prior complaint.

Dated: February 12, 2008

  
Robert A. Vort  
Attorney for Plaintiff  
2 University Plaza  
Hackensack, New Jersey 07601  
201-342-9501  
201-342-9504 fax  
rvort@vortlaw.com

Enclosure 1

*Application granted.*

*Liam Rose, Clerk, USDC*  
*March 19, 2008*